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9 **UNITED STATES BANKRUPTCY COURT**
10 **NORTHERN DISTRICT OF CALIFORNIA**
11 **SAN FRANCISCO DIVISION**

12 **In re:**

13 **PG&E CORPORATION,**

14 **- and -**

15 **PACIFIC GAS AND ELECTRIC**
16 **COMPANY,**

17 **Debtors.**

- 18 ☐ Affects PG&E Corporation
19 ☐ Affects Pacific Gas and Electric Company
☒ Affects both Debtors

20 ** All papers shall be filed in the Lead Case, No.*
21 *19-30088 (DM).*

Bankruptcy Case No. 19-30088 (DM)

Chapter 11

(Lead Case) (Jointly Administered)

**REORGANIZED DEBTORS' REPORT ON
RESPONSES TO FIFTY-FIRST THROUGH
FIFTY-SIXTH OMNIBUS OBJECTIONS TO
CLAIMS AND REQUEST FOR ORDERS BY
DEFAULT AS TO UNOPPOSED
OBJECTIONS**

[Re: Dkt. Nos. 9888, 9891, 9895, 9899, 9903,
9906]

**Resolving Objections Set for Hearing
February 9, 2021 at 10:00 a.m. (Pacific Time)**

1 **REQUEST FOR ENTRY OF ORDER BY DEFAULT**

2 PG&E Corporation (“**PG&E Corp.**”) and Pacific Gas and Electric Company (the “**Utility**”), as
3 debtors and reorganized debtors (collectively, the “**Debtors**” or the “**Reorganized Debtors**”) in the
4 above-captioned chapter 11 cases (the “**Chapter 11 Cases**”) hereby request, pursuant to Rule 9014-
5 1(b)(4) of the Bankruptcy Local Rules for the United States District Court for the Northern District of
6 California, as made applicable to these Chapter 11 Cases by the *Second Amended Order Implementing*
7 *Certain Notice and Case Management Procedures*, entered on May 14, 2019 [Dkt No. 1996] (“**Case**
8 **Management Order**”), that the Court enter orders by default on the following omnibus claims
9 objections (collectively, the “**Omnibus Objections**”):

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| Docket Number | Omnibus Objection |
|----------------------|--|
| 9888 | <i>Reorganized Debtors’ Fifty-First Omnibus Objection to Claims (Books and Records Claims)</i> (the “ Fifty-First Omnibus Objection ”) |
| 9891 | <i>Reorganized Debtors’ Fifty-Second Omnibus Objection to Claims (No Liability/Passthrough EGI Claims)</i> (the “ Fifty-Second Omnibus Objection ”) |
| 9895 | <i>Reorganized Debtors’ Fifty-Third Omnibus Objection to Claims (No Liability Subcontractor Claims)</i> (the “ Fifty-Third Omnibus Objection ”) |
| 9899 | <i>Reorganized Debtors’ Fifty-Fourth Omnibus Objection to Claims (Satisfied Claims)</i> (the “ Fifty-Fourth Omnibus Objection ”) |
| 9903 | <i>Reorganized Debtors’ Fifty-Fifth Omnibus Objection to Claims (Duplicative Claims)</i> (the “ Fifty-Fifth Omnibus Objection ”) |
| 9906 | <i>Reorganized Debtors’ Fifty-Sixth Omnibus Objection to Claims (ADR No Liability Claims)</i> (the “ Fifty-Sixth Omnibus Objection ”) |

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21 **RELIEF REQUESTED IN THE OMNIBUS OBJECTIONS**

22 The Omnibus Objections seek to either (a) disallow and/or expunge or (b) allow in reduced
23 amounts the Proofs of Claim listed in Exhibit 1 to each Omnibus Objection.

24 **NOTICE AND SERVICE**

25 The Reorganized Debtors filed a Notice of Hearing with respect to each Omnibus Objection
26 [Docket Nos. 9890, 9893, 9897, 9902, 9905, and 9908]. The Omnibus Objections also were supported
27 by the respective declarations of Robb McWilliams [Docket Nos. 9889, 9892, 9896, 9900, 9904, and
28 9907]. The Omnibus Objections, the Notices of Hearing, and the Declarations were served as

described in the *Certificate of Service of Alain B. Francoeur*, filed on January 4, 2021 [Docket No. 9927] (the “**Certificate of Service**”). As further described in the Certificate of Service, on December 28, 2020, each holder of a claim listed on Exhibit 1 to the Omnibus Objections received a notice customized to include (i) the claim number, debtor, claim amount and priority, and the basis for Reorganized Debtors’ objection with respect to the applicable claim to be disallowed and/or expunged or allowed in a reduced amount, and, if applicable (ii) the claim number, claim amount and priority of the surviving claim for each counterparty.

The deadline to file responses or oppositions to the Omnibus Objections has passed. The Reorganized Debtors have received the following formal and informal responses:

| Docket No. | Claimant | Claim No. | Resolution |
|--------------------------------------|--|--|---|
| Fifty-First Omnibus Objection | | | |
| Informal | Cosco Fire Protection | 69358 78400 | The Reorganized Debtors are attempting to resolve this matter consensually, and have agreed to an extension of Claimant’s response deadline to February 23, 2021. If the objection cannot be resolved, it will be continued to March 9, 2021. |
| Informal | JDB & Sons Construction Inc | 7711 7709 7708 7707 7706 7696 7655 7647 | The Reorganized Debtors are attempting to resolve this matter consensually, and have agreed to an extension of Claimant’s response deadline to February 10, 2021. If the objection cannot be resolved, it will be continued to February 24, 2021. |
| Informal | OPeak LLC as Transferee of Olympus Peak Master Fund L.P. | 71503 78886 88604 88180 | The Reorganized Debtors have reached a settlement of this Claim that resolves the Fifty-First Omnibus Objection. |
| 10012 | Eagle Ridge Preserve LLC | 8501 | The Reorganized Debtors are attempting to resolve this matter consensually, and have agreed to continue the hearing to March 9, 2021. |

| Docket No. | Claimant | Claim No. | Resolution |
|---------------------------------------|--|------------------|---|
| 10022 | Paso Robles Multifamily LLC | 97691 | The Reorganized Debtors are attempting to resolve this matter consensually, and have agreed to continue the hearing to March 9, 2021. |
| Informal | Sencha Funding LLC | 70769 | The Fifty-First Omnibus Objection was WITHDRAWN with respect to this Claim by Docket No. 9963. |
| Fifty-Second Omnibus Objection | | | |
| Informal | Cuyama Solar | 64176 | The Reorganized Debtors are attempting to resolve this matter consensually, and have agreed to an extension of Claimant's response deadline to February 11, 2021. If the objection cannot be resolved, it will be continued to February 24, 2021. |
| Fifty-Third Omnibus Objection | | | |
| Informal | ABC Landscaping & Excavating, Inc. | 79433 | The Reorganized Debtors are attempting to resolve this matter consensually, and have agreed to an extension of Claimant's response deadline to February 25, 2021. If the objection cannot be resolved, it will be continued to March 9, 2021. |
| 10019 | Burnett & Sons Planing Mill and Lumber Co. | 3080 | Claimant withdrew this Claim as set forth in Docket No. 10019. |
| 9915 | Hangtown Electric, Inc. dba Mr. Electric of Rancho Cordova | 2846 | Claimant withdrew this Claim as set forth in Docket No. 9915. |
| Fifty-Sixth Omnibus Objection | | | |
| Informal | David Mitchell | 2306 | The Fifty-Sixth Omnibus Objection was withdrawn with respect to this Claim by Docket No. 10011. |
| Informal | Antoinette Brewer | 79797 | The Fifty-Sixth Omnibus Objection was withdrawn |

| Docket No. | Claimant | Claim No. | Resolution |
|------------|-------------|----------------|--|
| | | | with respect to this Claim by Docket No. 10011. |
| Informal | Ken W. Bray | 80833 81365 | These Claims have been re-classified as Fire Victim Claims and channeled to the Fire Victim Trust. |

DECLARATION OF NO OPPOSITION RECEIVED

The undersigned hereby declares, pursuant to 28 U.S.C. § 1746, under penalty of perjury that:

1. I am an attorney with the law firm of Keller Benvenuti Kim LLP, co-counsel for the Reorganized Debtors

2. I have reviewed the Court's docket in the Chapter 11 Cases and have determined that no responses have been filed with respect to the Omnibus Objections except as described herein.

3. This declaration was executed in San Francisco, California.

WHEREFORE, the Reorganized Debtors hereby request entry of Orders (1) disallowing and expunging the Proofs of Claims listed in the column headed "Claim/Schedule To Be Disallowed and Expunged" in **Exhibit 1** to this Request and (2) allowing in the specified "Reduced Claim Amount" the Claims listed in **Exhibit 1** to this Request, which listed Claims are identical to those listed in Exhibit 1 to the Omnibus Objections, except as otherwise discussed above.

Dated: February 3, 2021

KELLER BENVENUTTI KIM LLP

By: /s/ Dara L. Silveira
Dara L. Silveira

Attorneys for Debtors and Reorganized Debtors